

MEMO ENDORSED

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November 30, 2007

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Hon. Denny Chin
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

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Attn: Sarah

Re: Ocean Lines Holding Ltd. v. China National Chartering Corp.
U.S.D.C., S.D.N.Y. Docket No.: 07 Civ. 8123 (DC)
LML ref: 1212

Dear Judge Chin:

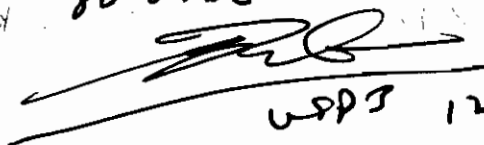
We are counsel for Defendant, China National Chartering Corporation, (hereinafter "Sinochart"), in the above-captioned matter. Sinochart's reply memorandum of law and supporting papers are due today per several extensions granted by the Court.

We write to respectfully request leave to file a 15 page reply memorandum of law, which would be 5 pages in excess of the 10 page limit per your Honor's motion practice rules. We make this request because of the extensive nature of the submissions on the motion to date and believe the extra 5 pages in the reply memorandum of law are needed in order to fully set out Sinochart's position on the motion. In this regard, it is noteworthy that Sinochart bears the ultimate burden of proof on the sovereign immunity issues germane to the motion. We respectfully submit that the extra 5 pages in the reply memorandum will enable us to respond appropriately to all of the evidence submitted by the Plaintiff in opposition to the motion.

We have conferred with Plaintiff's counsel to seek their consent to this request but were advised, understandably, that they would need to obtain their client's approval which, under the circumstances, is unlikely to be timely obtained.

In view of the foregoing, we respectfully request the Court's endorsement of this letter approving Sinochart's request to file a 15 page reply memorandum of law on the Motion to Vacate.

Approved,
SD ORDERED.


WPP 12/3/07